

Table: Summary of Actions and Deadlines		
Hartz Proposal	Details or Additional actions	Agency proposed dates
Dust products		
Missing: proposed date for submitting voluntary cancellation of dust/powder products <small>Ex. 5 Deliberative Process (DP)</small> Ex. 5 Deliberative Process (DP)	Submit voluntary cancellation of EPA Registration Numbers (Reg. Nos.), 2596-78, 2596-79.	June 30, 2020
Hartz proposed to provide production reports for dust/powders by September 1, 2020	Ex. 5 Deliberative Process (DP)	
Hartz proposed to cease production of dust/powders by July 31, 2020	Cease production of EPA Registration Numbers (Reg. Nos.) 2596-78, 2596-79	July 31, 2020
Hartz proposed to continue to sell and distribute existing dust/powder stocks through December 31, 2021.	Hartz shall not “release for shipment,” as that term is defined by 40 CFR § 152.3, any additional product for EPA Reg. Nos. 2596-78, 2596-79.	December 31, 2020 (proposing one year less)
Cancelled and Amended Cat Collar Products		
Hartz proposed submitting voluntary cancellation for 2596-63 (cat collar) July 1, 2020. <small>Ex. 5 Deliberative Process (DP)</small>	Submit an Ex. 5 Deliberative Process (DP) Ex. 5 Deliberative Process (DP) <small>Ex. 5 Deliberative Process (DP)</small> EPA Reg No. 2596-63.	June 30, 2020 rather than July 1 for consistency.
Hartz proposed to file an amended label with the agency on or before September 30, 2020 (Reg. No. 2596-49)	Submit an amendment for EPA Reg. No. 2596-49 to restrict use to cats and kittens at least 12 weeks of age and weighing five pounds or more.	June 30, 2020
Hartz proposed cease all production for EPA Reg No. 2596-49 (cat collar) by July 31, 2020 and will continue to sell and distribute existing stocks for 12 months after EPA’s approves the amended label.	Hartz shall not “release for shipment,” as that term is defined by 40 CFR § 152.3, any additional product consistent with the current collar label for EPA Reg. Nos. 2596-49.	April 1, 2021 (reminder - Court indicated process should be completed in one year (April 22, 2021)).

Ex. 5 Deliberative Process (DP)

Comments for discussion on June 17, 2020. Please note: this document conveys the agency’s comments as of 6/17/20 and does not indicate a finalized agreement.

[PAGE * MERGEFORMAT]

Redesigned Collar Products			Ex. 5 Deliberative Process (DP)
Hartz proposed to submit revised collar designs by September 30, 2020	Submit “concept package” revised collar design specifications (i.e., collar weights & dimensions), and detailed information on the changes to the production process that will reduce the Occupational and Residential Exposure (ORE) risk assessment estimates, all of which EPA finds to be valid and acceptable. For EPA Reg. Nos. 2596-50, 2596-62, 2596-83, 2596-84, and 2596-139	June 30, 2020	
Ex. 5 Deliberative Process (DP)			Ex. 5 Deliberative Process (DP)
Missing: date for official amendment application submission	Submit official amendment applications for redesigned collars, EPA Reg. Nos 2596-50, 2596-62, 2596-83, 2596-84, and 2596-139.	July or September 30, 2020	Ex. 5 Deliberative Process (DP)
Hartz requests permission to continue producing and selling the existing collars through December 31, 2021 or for one year from the date on which EPA approves the amendment, whichever period is longer. Hartz intends to maintain the current EPA Registration Numbers to avoid discontinuance of state registrations and new state registration fees, which would be excessive	Hartz shall not “release for shipment,” as that term is defined by 40 CFR § 152.3, any additional product consistent with the current collar formulations for EPA Reg. Nos. 2596-50, 2596-62, 2596-83, 2596-84, and 2596-139	Ex. 5 Deliberative Process (DP)	
		December 31, 2021	

Other comments:

- The final voluntary agreement will need to include a provision saying that, for products for which manufacture will continue until there’s a cancellation or amendment, Hartz shall not manufacture any more than usual.

Comments for discussion on June 17, 2020. Please note: this document conveys the agency’s comments as of 6/17/20 and does not indicate a finalized agreement.

[PAGE * MERGEFORMAT]

- The final voluntary agreement will need to include a provision to accept returned stocks/products.

Ex. 5 Deliberative Process (DP)

Comments for discussion on June 17, 2020. Please note: this document conveys the agency's comments as of 6/17/20 and does not indicate a finalized agreement.

[PAGE * MERGEFORMAT]